

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

WESTERNGECO L.L.C.,	§	
Plaintiff,	§	
vs.	§	CIVIL ACTION NO. 4:09-cv-01827
ION GEOPHYSICAL CORPORATION, FUGRO-GEOTEAM, INC., FUGRO- GEOTEAM AS, FUGRO NORWAY MARINE SERVICES AS, FUGRO, INC., FUGRO (USA), INC. AND FUGRO GEOSERVICES, INC.	§	Judge Keith P. Ellison
Defendants.	§	

**JOINDER IN ION GEOPHYSICAL CORPORATION'S RESPONSES IN OPPOSITION  
TO PLAINTIFF WESTERNGECO L.L.C.'S MOTIONS FOR SUMMARY JUDGMENT**

Fugro-Geoteam, Inc., Fugro-Geoteam AS, Fugro, Inc., Fugro (USA), Inc., and Fugro Geoservices, Inc. (collectively, “the Fugro Defendants”) hereby join Defendant ION Geophysical Corporation’s Response in Opposition to Plaintiff WesternGeco’s Motion for Summary Judgment on Defendants’ Inventorship Counterclaims and Derivative Defenses and Claims (Dkt. 185.) and the portions of Ion Geophysical Corporation’s Response to in Opposition to Plaintiff WesternGeco’s L.L.C’s Motion for Summary Judgment on ION’s Inequitable Conduct Defense and Antitrust Counterclaim Regarding the Zajac ‘038 Patent (Dkt. 183.) regarding inequitable conduct. Both of these pleadings (Dkt. 183, 185) are hereby incorporated by reference in their entirety, including all exhibits.

Dated: November 14, 2011

Respectfully submitted,

s/ Jason Saunders  
Gordon Arnold  
Texas Bar No.: 01342410  
Federal ID No.: 12483  
Attorney-in-Charge  
garnold@arnold-iplaw.com  
Jason A. Saunders  
Texas Bar No.: 24042406  
Federal ID No.: 557143  
jsaunders@arnold-iplaw.com  
Arnold & Knobloch L.L.P.  
4900 Woodway, Suite 900  
Houston, Texas 77056  
Telephone: (713) 972-1649  
Facsimile: (713) 972-1180

John M. Elsley  
Texas Bar No.: 06591950  
Federal ID No.: 2828  
Jason C. Petty  
Texas Bar No.: 24065902  
Federal ID No.: 1120630  
Royston, Rayzor, Vickery & Williams,  
L.L.P.  
711 Louisiana, Suite 500  
Houston, Texas 77002-6418  
Telephone: (713) 224-8380  
Facsimile: (713) 225-9945

**ATTORNEYS FOR DEFENDANTS,  
FUGRO-GEOTEAM, INC.,  
FUGRO, INC.,  
FUGRO (USA), INC.,  
FUGRO GEOSERVICES, INC., AND  
FUGRO-GEOTEAM AS**

**CERTIFICATE OF SERVICE**

I hereby certify that, on November 14, 2011 a true and correct copy of the Fugro Defendant's Joinder in Ion Geophysical Corporation's Responses in Opposition to Plaintiff Westerngeco L.L.C's Motions for Summary Judgment was served on all counsel of record *via CM/ECF*.

*/s/ Jason Saunders*

Arnold & Knobloch L.L.P.